



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

**CERTIFIED MAIL
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**URGENT LEGAL MATTER
REQUIRES PROMPT RESPONSE**

March 8, 2007

Thomas Coz, President
Polyfoam Corporation ("Polyfoam")
2355 Providence Road
Northbridge, MA 01534

Re: Clean Air Act Reporting Requirement, Docket No. AAA-07-0007

Dear Mr. Coz:

The United States Environmental Protection Agency ("EPA") is evaluating whether the Polyfoam Corporation facility in Northbridge, MA ("Polyfoam") is in compliance with the Clean Air Act (the "Act") and state and federal regulations promulgated under the Act. The regulations include the federally enforceable sections of the Massachusetts State Implementation Plan regulations at 310 CMR 7.00 et. seq.: Air Pollution Control Regulations.

Section 114(a)(1) of the Act, 42 U.S.C. Section 7414(a)(1), gives EPA the authority to require a facility to submit such information as EPA may reasonably require to determine the facility's compliance with the Act. Therefore, within 45 days of the date Polyfoam receives this reporting requirement, Polyfoam is required to provide all of the information outlined below for the Northbridge facility ("facility") unless otherwise specified. Provide a separate numbered response to each numbered paragraph or subparagraph below:

1. Provide copies of all records Polyfoam used to track the VOC emissions at the facility between January 1, 2001 and December 31, 2006. At a minimum, provide copies of the following reports (or their equivalent) for the time period between January 1, 2001 and December 31, 2006:
 - a. The *Raw Materials Receiving Log* and the associated *Certificates of Analysis* provided by the vendors for each expandable polystyrene bead that was received by Polyfoam;
 - b. The *Polyfoam Corporation Daily Resin Consumption Reports*;
 - c. The *Calculation of Average VOC Reports*;

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- d. The *"Shipped-in Product"* Reports;
 - e. The *Accountable VOC* Reports;
 - f. The *VOC Emission Log*;
 - g. The *VOC Emissions Log (12 Month Rolling Average)*;
 - h. The *Quarterly Report for Polyfoam Corporation*;
 - i. The annual *Hours of Operation* log; and
 - j. The daily hours of operation log.
2. Provide copies of the calculations that Polyfoam conducted to fill out the Massachusetts Department of Environmental Protection's "Source Registration" for 2001 through 2006.
3. Provide the date when Polyfoam began using expanded polystyrene beads with lower pentane content (i.e., less than the original beads that contained approximately 6.2% pentane). If you do not have the exact date, provide an estimated date and the information used to make the estimate.
4. For 2004 through 2006, estimate how much of its own scrap expanded polystyrene Polyfoam reused in day to day operations. Also, estimate how much scrap expanded polystyrene Polyfoam received from other sources. Include copies of the information used to make this estimate.
5. For 2004 through 2006, estimate the average length of time in days that expanded polystyrene products were stored on-site. Explain how Polyfoam made the estimate and include, at a minimum, copies of the daily production records of products produced at the molding machines and records showing the date when these products were shipped offsite.
6. Provide the following information (and corresponding documentation) about the polystyrene expanders that Polyfoam currently uses:
 - a. The date the expander was purchased.
 - b. The date the expander was installed.
 - c. The date the expander began operating.
 - d. The name of the manufacturer, model number, size of the expander, production rate, and any other operational specifications of the expander.
7. Polyfoam obtained a permit on April 10, 2000 from the MassDEP to install a 250 horsepower natural gas-fired boiler. Provide the following information (and corresponding documentation) about this boiler:
 - a. The date the boiler was purchased.
 - b. The date the boiler installation was completed.
 - c. The date the boiler began operating.

- d. The name of the manufacturer, model number, size of the boiler, production rate, and any other operational specifications of the boiler.
 - e. Explain how this boiler is being used. For example, did this boiler replace an existing boiler, or is Polyfoam using this boiler in concert with existing boilers?
8. Provide a list of all other process equipment (e.g. expanders, pre-puff aging bags, molding machines) and process support equipment (e.g. boilers, compressors) valued above \$1000 that Polyfoam purchased since January 2000. Also, for each piece of equipment, provide the following information (and corresponding documentation):
- a. The purpose/role of the equipment.
 - b. The date the equipment was purchased.
 - c. The date the equipment installation was completed.
 - d. The date the equipment began operating.
 - e. The name of the manufacturer, model number, size of the equipment, maximum production rate, and any other operational specifications of the equipment.

Be aware that if Polyfoam does not provide the requested information, EPA may order Polyfoam to comply and may assess monetary penalties under Section 113 of the Act, 42 U.S.C. Section 7413. Federal law also establishes criminal penalties for providing false information to EPA. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act.

Polyfoam may, if desired, assert a business confidentiality claim covering part or all of the information requested, in the manner described by 40 CFR § 2.203(b). Note that certain categories of information are not properly the subject of such a claim. If no such claim accompanies the information when it is received by EPA, the information may be made available to the public by EPA without further notice to Polyfoam. Please be aware that the Commonwealth of Massachusetts may have different rules and regulations governing the protection of confidential business information.

You are required to submit the above-required information to:

Susan Studlien, Director
Office of Environmental Stewardship (Mail Code SAA)
U.S. Environmental Protection Agency, Region I
One Congress Street, Suite 1100
Boston, Massachusetts 02114-2023

Attn: Steven J. Calder, Air Technical Unit

If you have any questions regarding this reporting requirement, please contact Steven Calder, Environmental Engineer at (617) 918-1744 or have your attorney call Thomas Olivier, Senior Enforcement Counsel at (617) 918-1737.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

Enc.: Small Business Fact Sheet

cc: Patricia Arp, MassDEP